

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MYRNA LACK,

Plaintiff,

-against-

CAESARS ENTERTAINMENT CORPORATION,
HARRAH'S ATLANTIC CITY, LLC, HARRAH'S
ATLANTIC CITY OPERATING COMPANY, LLC,
HARRAH'S ATLANTIC CITY PROPCO, LLC, and
HARRAH'S BOSSIER CITY INVESTMENT
COMPANY, LLC,

Defendants.

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CASE NO.: 20-cv-05394

**DEFENDANTS CAESARS
ENTERTAINMENT
CORPORATION, HARRAH'S
ATLANTIC CITY, LLC,
HARRAH'S ATLANTIC CITY
OPERATING COMPANY, LLC,
HARRAH'S ATLANTIC CITY
PROPCO, LLC, and HARRAH'S
BOSSIER CITY INVESTMENT
COMPANY, LLC
RULE 26(a)(2) DISCLOSURE**

The Defendants, **CAESARS ENTERTAINMENT CORPORATION, HARRAH'S ATLANTIC CITY, LLC, HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC, HARRAH'S ATLANTIC CITY PROPCO, LLC, and HARRAH'S BOSSIER CITY INVESTMENT COMPANY, LLC**, by and through its attorneys, **FULLERTON BECK, LLP**, as and for its Response to FRCP 26(a)(2) discloses the following witness who has been retained to provide expert testimony in support of Defendants **CAESARS ENTERTAINMENT CORPORATION, HARRAH'S ATLANTIC CITY, LLC, HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC, HARRAH'S ATLANTIC CITY PROPCO, LLC, and HARRAH'S BOSSIER CITY INVESTMENT COMPANY, LLC** claims and defenses and submits the accompanying written report prepared and signed by the witness:

EXPERT WITNESS

Ramesh Gidumal, M.D.
Department of Orthopedic Surgery
333 East 38th Street 4th Floor,
New York, NY 10016

Dr. Gidumal is an expert in the field of orthopedic surgery. Dr. Gidumal will express his opinions regarding his findings upon physical examination of plaintiff; plaintiff's current physical

limitations and ability to return to her activities of daily living; plaintiff's need for further medical care; his diagnosis and prognosis of plaintiff; causation of plaintiff's claimed injuries; whether plaintiff's surgeries were causally related to the subject incident; whether plaintiff has any disability as a result of the subject incident, and other medical opinions related to the Plaintiff and the subject incident.

Dr. Gidumal will base his opinions upon his physical examination of plaintiff; review of plaintiff's assorted medical records and diagnostic testing conducted, including but not limited to x-rays, CT scans, MRI films and any other radiological evidence, as set forth within Dr. Gidumal's reports, dated October 9, 2021 and November 16, 2021, copies of which are annexed hereto as **Exhibit "A"**. Dr. Gidumal's opinions that will form the basis of his testimony at trial are described more fully within his written reports annexed hereto as **Exhibit "A"**. Dr. Gidumal's qualifications, fee schedule and a listing of cases in which he has given testimony over the past four (4) years are also annexed hereto as **Exhibit "B"**.

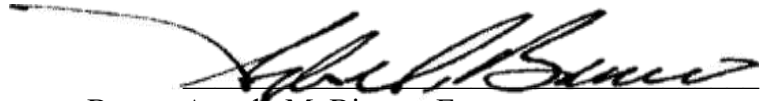
Dr. Gidumal reserves the right to testify regarding any examinations conducted by plaintiff's experts, as well as any medical evidence and/or testimony adduced at trial.

PLEASE TAKE NOTICE that Defendants, **CAESARS ENTERTAINMENT CORPORATION, HARRAH'S ATLANTIC CITY, LLC, HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC, HARRAH'S ATLANTIC CITY PROPCO, LLC, and**

HARRAH'S BOSSIER CITY INVESTMENT COMPANY, LLC, reserve the right to amend and/or supplement this response up to and including the time of trial.

Dated: White Plains, New York
April 29, 2022

FULLERTON BECK, LLP

A handwritten signature in black ink, appearing to read 'Angelo M. Bianco', is written over a horizontal line.

By: Angelo M. Bianco, Esq.
Attorneys for Defendants
**CAESARS ENTERTAINMENT
CORPORATION, HARRAH'S
ATLANTIC CITY, LLC,
HARRAH'S ATLANTIC CITY
OPERATING COMPANY, LLC,
HARRAH'S ATLANTIC CITY
PROPCO, LLC, and HARRAH'S
BOSSIER CITY INVESTMENT
COMPANY, LLC**
One West Red Oak Lane
White Plains, New York 10604
Tel No.: (914) 305-8634
File No.: 1110-011

To: **SONIN & GENIS, LLC**
Attorney for Plaintiff
One Fordham Plaza, Suite 907
Bronx, New York 10458
Tel No.: (718) 561-4444